

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
vs.) Case No. 19-00087-01-CR-W-HFS
)
)
CAROL L. DILLE,)
)
)
Defendant.)

**MOTION FOR CONTINUANCE
WITH SUGGESTIONS**

COMES NOW the defendant, Carol L. Dille by and through her counsel, Travis D. Poindexter, Assistant Federal Public Defender for the Western District of Missouri, in accordance with Rule 47, Fed. R. Crim. P., and Rule 7.0 (b) and (c) of the Local Rules of Procedure for the United States District Court for the Western District of Missouri, and moves this Court, pursuant to 18 U.S.C. §3161(h)(7)(A) and (B), to remove this case from the Accelerated Joint Criminal Trial Docket scheduled to commence October 28, 2019, and to continue this case until the Accelerated Joint Criminal Trial Docket scheduled to commence on February 10, 2020.

SUGGESTIONS IN SUPPORT OF MOTION FOR CONTINUANCE

1. On March 6, 2019, an Indictment was filed charging defendant with three counts of Wire Fraud in violation of 18 U.S.C §§ 1343; one count of Theft of Government Money in violation of 18 U.S.C. §§641; one count of Aggravated Identity Theft in violation of 18 U.S.C. §1028A and two counts of

Bankruptcy Fraud – False Oaths and Claims in violation of 18 U.S.C. 152.

2. The Federal Public Defender's Office was appointed to represent Ms. Dille.

3 Counsel needs more time to conduct investigation into the case, consult with Ms. Dille about her legal options and prepare for trial. One prior continuance was granted

4. Courtney Pratten Assistant United States Attorney, has indicated that she has no objections to this continuance.

5. This continuance is sought not for purpose of dilatory delay, but is sought in truth and fact that the defendant may be afforded due process of law under the Fifth Amendment to the United States Constitution. In accordance with 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), it is submitted that the above-stated reasons for a continuance outweigh the best interests of the public and the defendant to a speedy trial, which is required by 18 U.S.C. § 3161(c)(1).

6. Under the provisions of 18 U.S.C. § 3161(h)(7)(A) the period of time until the next criminal trial docket should be excluded in computing the period of time in which the defendant should be brought to trial under the provisions of the Speedy Trial Act.

WHEREFORE, the defendant, Carol L. Dille, respectfully requests this Court, pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B), to remove this case from the Accelerated Joint Criminal Trial Docket scheduled to commence

October 28, 2019, and to continue this case until the Accelerated Joint Criminal Trial Docket scheduled to commence on February 10, 2020.

Respectfully submitted,

/s Travis D. Poindexter

TRAVIS D. POINDEXTER
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

It is hereby CERTIFIED that on September 30, 2019, the foregoing motion was electronically filed and delivered on the ECF System.

/s Travis D. Poindexter

Travis D. Poindexter